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*Attorneys for Petitioner*

*KG SCHIFFFAHRTSGESELLSCHAFT MS PACIFIC WINTER MBH & CO.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KG SCHIFFFAHRTSGESELLSCHAFT MS  
PACIFIC WINTER MBH & CO.

*Petitioner,*

-against-

SAFESEA TRANSPORT INC.

*Respondent.*

Civil Action No.:

**NOTICE OF PETITION TO RECOGNIZE,  
ENFORCE AND CONFIRM  
A FOREIGN ARBITRATION AWARD  
AND FOR ENTRY OF JUDGMENT**

**PLEASE TAKE NOTICE** that upon (1) the Petition to Recognize, Enforce and Confirm a Foreign Arbitration Award and For Entry of Judgment; (2) the Declaration of Lauren B. Wilgus Esq. in Support of the Petition dated February 5, 2019 and (3) the Exhibits attached thereto, including a copy of the Final Award of the Arbitrator of the London Maritime Arbitration Association, in the arbitration proceeding between Petitioner and Respondent (the “Final Award”); Petitioner KG SCHIFFFAHRTSGESELLSCHAFT MS PACIFIC WINTER MBH & CO. will move this Court on the 18<sup>th</sup> day of March, 2019 at the Courthouse, located at 50 Walnut Street, Newark, New Jersey 07101 for entry of an order and judgment recognizing, enforcing and confirming the Final Award, directing that judgment be entered thereon in the amount of **\$122,367.86**, plus post-judgment interest, and the costs, disbursements and attorneys’ fees of this

proceeding and granting such other and further relief as this Court deems just and proper.

Answering papers, if any, to this motion shall be served on Blank Rome LLP, 405 Lexington Avenue, New York, NY 10174 pursuant to L. Civ. R. 78.1(a), on or before February 22, 2019. Failure to respond will result in the granting of Petitioner's motion.

Dated: February 6, 2019

BLANK ROME LLP

By: /s/ Lauren B. Wilgus

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